

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|---------------------------------|---|------------------------------|
| UNITED STATES OF AMERICA |) | Docket No.: 1:13CR383 |
| |) | |
| v. |) | Judge O’Grady. |
| |) | |
| Anthony Tadros |) | |

**MOTION TO MODIFY DEFENDANT THOMAS BELL’S
CONDITIONS OF RELEASE**

COMES NOW the Defendant, Anthony Tadros, and moves to modify his release conditions in the present matter. As reasons therefor, Counsel on behalf of Mr. Tadros states as follows:

1. Defendant Anthony Tadros is a United States citizen and currently resides in Connecticut. On October 4, 2013, the United States District Court for the District of Eastern Virginia placed release conditions upon Mr. Tadros in the present matter. Mr. Tadros is currently being supervised by the Pretrial Services Agency in his home state and has striven to comply with all conditions . Upon information and belief, there are no violations of release conditions to date by Mr. Tadros.
2. Consistent with his conditions, Mr. Tadros has gained employment and requests modifications giving him permission to travel and to use computers for his work as required by his employers.
3. Due to the cost and distance of traveling from Connecticut, Mr. Tadros would request that he be excused from attending status hearings, with his appointed

counsel attending and representing his interests.

WHEREFORE, counsel, requests that Mr. Tadros's conditions be modified as requested above, or any other appropriate relief.

Respectfully submitted,
/s/
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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 11th day of January, 2014, resulting in a notification of such filing (NEF) to the following:
Alexander T.H. Nguyen and Jay V. Brabhu, Assistant U.S. Attorneys, 2100

Jamieson Avenue, Alexandria, Virginia 22314 and all counsel of record.

/s/

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